

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS BENEFIT FUND,)
BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS PENSION FUND,)
BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS EDUCATION)
FUND, BOARD OF TRUSTEES OF) No. 08 C 1212
THE NORTHERN ILLINOIS)
RETIREMENT FUND,) Judge Shadur
)
Plaintiffs,) Magistrate Judge Valdez
)
v.)
)
ALL ABOUT REPAIR PLUMBING, INC.)
An Illinois Corporation,)
)
Defendant.)

**MOTION FOR ORDER OF DEFAULT
AND JUDGMENT IN SUM CERTAIN**

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ, PHILIP BRZOZOWSKI and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendant, ALL ABOUT REPAIR PLUMBING, INC., an Illinois corporation.

In support thereof, Plaintiffs state:

1. This case was filed on February 28, 2008.
2. Defendant was served with Summons and Complaint on March 5, 2008.
3. In excess of 20 days have expired since Service of Process, however, Defendant has failed to file an answer or otherwise plead.
4. Per the affidavit of Adam Strode, Defendants owe \$88,043.78 which includes delinquent contributions and liquidated damages. (See Exhibit "1") Additionally, there were

\$895.47 in audit costs charged to Plaintiffs.

5. Per the affidavit of Philip Brzozowski, attorney for Plaintiffs, \$1,575.00 in legal fees and expenses have been incurred in attempting to collect the amounts owed by Defendants. (See Exhibit "2")

WHEREFORE, Plaintiffs pray for:

1. An Order of Default and Judgment against the Defendant.
2. Judgment be rendered in the amount of \$90,514.25.

Respectfully submitted,

**TRUSTEES OF THE NORTHERN
ILLINOIS BENEFIT FUND, LOCAL
501, et al.**

By: s/ Philip Brzozowski
One of their Attorneys

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